

European Commission

Den 9. juni 2021

Declaration of Digital Principles – the ‘European way’ for the digital society

The Danish Chamber of Commerce hereby submits our response to the initial hearing on the Declaration of Digital Principles roadmap.

We fully support the intention and note that a set of guiding principles is instrumental for policy makers to ensure the digital transition, and at the same time ensure that all actors can participate in the transition.

We support the principles mentioned in the roadmap and have listed them below with our comments. Additionally, we propose adding a few additional principles.

Principles from the Digital Compass Communication

- Universal access to internet services – *we view this as critical and encourage strong collaboration with the telecommunications industry to support this*
- A secure and trusted online environment – *in order to instrumentalize this principle, regulation should support development of technologies using privacy and security by design principles*
- Universal digital education and skills for people to take an active part in society and in democratic processes – *access to digital skills should be considered a right for citizens*
- Access to digital systems, devices and services that respect the climate and environment
- Accessible and human-centric digital public services and administration
- Ethical principles for human centric algorithms – *data ethics should be considered a source of competitive advantage for European firms.*
- Protecting and empowering children and young people in the online space
- Access to digital health services – *we support this and would like to add that access to health data is a key component*

Proposed additional principles

In addition to our comments on the above principles, we propose to add:

- Digital regulation should support innovation and the use technology to achieve our goals
- A technology positive outlook that acknowledges the benefits of digitization and does not play up the risks e.g. for abuse

We appreciate any opportunity to be included in the work on Digital Principles and are available for elaboration and further comments if necessary.

Kind regards,

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